

May 4, 2011

Nicole Miller  
Campaign Finance Analyst  
Federal Election Commission  
999 E St., NW  
Washington, DC 20463

Identification Number: C00044776

Reference: Amended 30 Day Post-General Report (10/14/10-11/22/10), received 1/31/11

Dear Ms. Miller:

This letter is in response to your request for additional information, dated March 30, 2011.

1. You indicate that total receipts changed by \$33,992.38. On line 11ai, the contribution in the amount of \$10,000 from Tim Wellborn that was returned for nonsufficient funds was originally disclosed as a memo entry instead of a negative receipt. The memo entry did not correctly deduct \$10,000 from the total receipts. The amended report accurately reflected the \$10,000 adjustment. On line 18, a transfer from the nonfederal account for allocation of expenses was incorrectly entered into the software and was not included on the original report. The amended report accurately reflected this transfer.
2. All expenses for FEA related activity were paid with funds that are permitted by the Act, such as direct contributions from individuals and federal political committees, none of which were designated for any particular candidate. The indication that these were "Volunteer Mailers" confirms that no public advertising or commercial vendors were used. None of these expenses were paid with funds transferred in from the National Party Committees.
3. As was indicated on the amended October Monthly Report filed 4/28/11, this clarifies that the vendor listed as Business Card correctly discloses the full name and address of this vendor. Business Card is the credit card vendor that the Committee pays. All ultimate vendors are correctly itemized. The Committee has accurately reported payments to this vendor for several years with no previous inquiries from the FEC.
4. You indicate that Schedule H4 discloses payments for consulting services and ask for clarification that these were not payments to salaried employees. All salaried employees are accurately disclosed on Schedule B, Line 30b with the notation FEA-Salary. The payments for consulting services are accurately disclosed on Schedule H4 and allocated as administrative expenses as permitted by the Act. The Committee has accurately reported these payments for several years with no previous inquiries concerning these disbursements from the FEC.

The Committee believes that no amendment to the above referenced report is required at this time.

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